

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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Operator: PEOPLES GAS LIGHT AND COKE CO.	Operator ID#: 15329
Inspection Date(s): 1/29/2014, 1/30/2014, 1/31/2014	Man Days: 3
Inspection Unit: Technical Training & Standards	
Location of Audit: Chicago	
Exit Meeting Contact: Tom Webb	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Aaron McElravy	
Company Representative to Receive Report: Tom Webb	
Company Representative's Email Address: TJWebb@peoplesgasdelivery.com	

Headquarters Address Information:	130 E. Randolph Street Chicago, IL 60601 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Jodi Caro Phone#: (000) 000-0000 Email:	Willard Evans Phone#: (000) 000-0000 Email:
Inspection Contact(s)	Title	Phone No.
Glannie Chan	Supervisory Engineer	
Tom Webb	Compliance Manager	(312) 240-4650
Eddie Morrow	Senior Engineer	

REPORTING PROCEDURES		Status
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
<u>General Comment:</u> <i>The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.</i>		
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	Satisfactory
<u>General Comment:</u> <i>The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.</i>		

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[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	Satisfactory
<u>General Comment:</u> <i>The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.</i>		
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	Satisfactory
<u>General Comment:</u> <i>The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.</i>		
[192.605(b) (4)][191.15(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	Satisfactory
<u>General Comment:</u> <i>The procedures for regulatory reporting including telephonic notices of incidents and report submission requirements are located in Exhibit 7 of the Emergency Plan Section 5, A Pages 2-6.</i>		
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	Satisfactory
<u>General Comment:</u> <i>The procedures for notification and filing of safety related conditions including examples of conditions to be reported are located in Exhibit 7 of the Emergency Plan Section 5, H Pages 27-31.</i>		
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	Satisfactory
<u>General Comment:</u> <i>The procedures for notification and filing of safety related conditions including examples of conditions to be reported are located in Exhibit 7 of the Emergency Plan Section 5, H Pages 27-31.</i>		
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	Satisfactory
<u>General Comment:</u> <i>The procedures for reporting accidents or damages to the ICC are located in Exhibit 7 of the Emergency Plan Section 5, B Pages 7-12.</i>		
CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES		Status
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	Satisfactory
<u>General Comment:</u> <i>The procedures for customer notification are located in the Integrys O&M Manual Section 1550 Pages 1-6.</i>		

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[192.13(c)][192.381]	Does the operator's procedure require that when EFVs are installed on single family residents that shall at a minimum meet the performance requirements of §192.381?	Satisfactory
<u>General Comment:</u> <i>The procedures regarding the EFV requirements are located in the Integrys O&M Manual Section 520.4.3 Page 6.</i>		
INSTALLATION OF TRANSMISSION & DISTRIBUTION MAIN PIPE		Status
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	Satisfactory
<u>General Comment:</u> <i>The procedure for the installation of a transmission line or main in a ditch are located in the Distribution O&M Main Work Order 9.400 Pages 4-5.</i>		
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	Satisfactory
<u>General Comment:</u> <i>The procedure for the installation of tracer wire for plastic pipe for means of locating are located in the Distribution O&M General Order 7.010 Pages 1-6.</i>		
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	Satisfactory
<u>General Comment:</u> <i>The procedures for casings under railroads or highways are located in the Distribution O&M, Corrosion Control Order 8.134 Pages 1-3.</i>		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	Satisfactory
<u>General Comment:</u> <i>The procedures for main clearance and depth requirements are located in the Distribution O&M, Main Work Order 1.000 Pages 1-2.</i>		
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	Satisfactory
<u>General Comment:</u> <i>The procedures for main clearance and depth requirements are located in the Distribution O&M, Main Work Order 1.000 Pages 1-2.</i>		
[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	Satisfactory
<u>General Comment:</u> <i>The procedures for weather consideration and storage of plastic pipe are located in the Integrys O&M Section 420.4.4 Page 6.</i>		
SERVICE LINE INSTALLATION		Status
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	Satisfactory
<u>General Comment:</u>		

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<i>The procedures located in the Distribution O&M, Main Work Order 1.000 Pages 1-2 include depth requirements.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	Satisfactory
<u>General Comment:</u> <i>The procedures for support and backfill are located in the Distribution O&M, Service Pipe Work Order 1.000 Pages 1-3.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	Satisfactory
<u>General Comment:</u> <i>The procedures for support and backfill including strain and loading are located in the Distribution O&M, Service Pipe Work Order 1.000 Pages 1-3.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line into a building	Satisfactory
<u>General Comment:</u> <i>The procedures for service lines under buildings and service lines installed into buildings are located in the Integrys Field Manual Section 520 Pages 6-7.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	Satisfactory
<u>General Comment:</u> <i>The procedures for service lines under buildings and service lines installed into buildings are located in the Integrys Field Manual Section 520 Pages 6-7.</i>		
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	Satisfactory
<u>General Comment:</u> <i>The procedure for service line valve location is located in the Distribution O&M, General Order 7.007 Page 1.</i>		
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	Satisfactory
<u>General Comment:</u> <i>The procedures for the location of the connection to the main are located in the Integrys O&M Section 520.2.13 Page 8.</i>		
CUSTOMER METERS AND REGULATORS		Status
[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	Satisfactory
<u>General Comment:</u> <i>The procedures for customer meters and regulators requirements are located in the Distribution O&M, Exhibit 1 Service Pipe Work Order 3.200 Pages 1-18 and the Integrys Manual 610.2.1 Pages 1-13.</i>		
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	Satisfactory
<u>General Comment:</u>		

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<i>The procedures for customer meters and regulators requirements are located in the Distribution O&M, Exhibit 1 Service Pipe Work Order 3.200 Pages 1-18 and the Integrys Manual 610.2.1 Pages 1-13.</i>		
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	Satisfactory
<u>General Comment:</u> <i>The procedures for customer meters and regulators requirements are located in the Distribution O&M, Exhibit 1 Service Pipe Work Order 3.200 Pages 1-18 and the Integrys Manual 610.2.1 Pages 1-13.</i>		
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	Satisfactory
<u>General Comment:</u> <i>The procedures for customer meters and regulators requirements are located in the Distribution O&M, Exhibit 1 Service Pipe Work Order 3.200 Pages 1-18 and the Integrys Manual 610.2.1 Pages 1-13.</i>		
NORMAL OPERATING AND MAINTENANCE PROCEDURES		Status
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>The procedures for the review of the O&M including the OQ plan are located in the Integrys O&M Section 1520 Pages 1-5 and the General Section, Sub Section 4 Page 27-28.</i>		
Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?		Yes
<u>General Comment:</u> <i>The procedures for the review of the O&M including the OQ plan are located in the Integrys O&M Section 1520 Pages 1-5 and the General Section, Sub Section 4 Page 27-28.</i>		
Do procedures clearly include the name of the reviewer and dates of reviews?		Not Applicable
<u>General Comment:</u> <i>The procedures for the review of the O&M including the OQ plan are located in the Integrys O&M Section 1520 Pages 1-5 and the General Section, Sub Section 4 Page 27-28.</i>		
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Section General Section 4 Page 28.</i>		
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	Satisfactory
<u>General Comment:</u> <i>The procedure for startup and shut down are located in Exhibit 12 Chapter 3 Section 7 Page 2.</i>		

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[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	Satisfactory
<u>General Comment:</u> <i>The procedures for reviewing work done by personnel are located in the QA Plan Exhibit 5 Page 4.</i>		
[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	Satisfactory
<u>General Comment:</u> <i>The procedures for protecting personnel in excavated trenches including the use of respirator equipment and training are located in Exhibit 12, Chapter 7, Sections 2 and 3.</i>		
ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION		Status
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	Satisfactory
<u>General Comment:</u>		

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<i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Emergency Plan Exhibit 7, Section 1, Page 1 and Exhibit 7 Section 4 Pages 1-31.</i>		
CHANGE IN CLASS LOCATION PROCEDURES		Status
[192.605(a)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	Satisfactory
<u>General Comment:</u> <i>The procedures for class location surveys and revisions to the MAOP are located in Exhibit 13 Pages 29-31.</i>		
[192.605(a)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	Satisfactory
<u>General Comment:</u>		

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The procedures for class location surveys and revisions to the MAOP are located in Exhibit 13 Pages 29-31.

CONTINUING SURVEILLANCE PROCEDURES		Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	Satisfactory
General Comment: The procedures for continuing surveillance are located in General, Exhibit 0 Pages 16-18.		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	Satisfactory
General Comment: The procedures for continuing surveillance are located in General, Exhibit 0 Pages 16-18.		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	Satisfactory
General Comment: The procedures for the examination of cast iron including appropriate actions are located in Exhibit 10, Corrosion Control Policy Pages 21-21 and Exhibit 1 Corrosion Control Order 8.137 Page 1.		
[192.613(a)][192.489]	Does the operator's procedure include requirements for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating maintenance conditions?	Satisfactory
General Comment: The procedures for the examination of cast iron including appropriate actions are located in Exhibit 10, Corrosion Control Policy Pages 21-21 and Exhibit 1 Corrosion Control Order 8.137 Page 1.		
DAMAGE PREVENTION PROGRAM PROCEDURES		Status
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- identifies persons who engage in excavating?	Satisfactory
General Comment: The procedures are located in the Damage Prevention Program Exhibit 9 Pages 1-12.		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification to the public in the One Call	Satisfactory

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	area?	
<u>General Comment:</u> <i>The procedures are located in the Damage Prevention Program Exhibit 9 Pages 1-4.</i>		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means for receiving and recording notifications of pending excavations?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Damage Prevention Program Exhibit 9 Pages 1-4.</i>		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification of pending excavations to the members?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Damage Prevention Program Exhibit, Section 5.0 Page 4.</i>		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means of temporary marking for the pipeline in the vicinity of the excavations?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Damage Prevention Program Exhibit 9 Page 7.</i>		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Damage Prevention Program Exhibit 9, Section 8.6 Page 10.</i>		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the Damage Prevention Program Exhibit 9, 8.4 Page 10.</i>		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		Yes
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the		Yes

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<p>dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?</p>		
<p><u>General Comment:</u></p> <p><i>The procedures for boring and trenchless technologies are located in General Order 6.100 and the Integrys O&M Section 920.</i></p>		
<p>[IL ADM. CO.265.100(b)]</p>	<p>Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?</p>	<p>Satisfactory</p>
<p><u>General Comment:</u></p> <p><i>The procedure for reporting third party damage to mains when a release occurs is located in Exhibit 7, Section 5 Page 7.</i></p>		
<p>EMERGENCY PROCEDURES</p>		<p>Status</p>
<p>[192.615(a)(9)]</p>	<p>Does the operator have procedures for restoring service outages after the emergency has been rendered safe?</p>	<p>Satisfactory</p>
<p><u>General Comment:</u></p> <p><i>The procedures for restoring service once the situation has been rendered safe are located in the Emergency Operating Plan Section 4, I Page 9.</i></p>		
<p>[192.615(a)(1)]</p>	<p>Does the operator have procedures for receiving, identifying, and classifying notices of events which require immediate response by the operator?</p>	<p>Satisfactory</p>
<p><u>General Comment:</u></p> <p><i>The procedures for receiving, identifying and classifying notices requiring immediate response are located in the Emergency Operating Plan Section 4, C Page 2.</i></p>		
<p>[192.615(a)(2)]</p>	<p>Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding possible emergency?</p>	<p>Satisfactory</p>
<p><u>General Comment:</u></p> <p><i>The procedures for establishing and maintaining communication with appropriate public officials are located in the Emergency Operating Plan Section 4, E Page 3.</i></p>		
<p>[192.615(a)(3)(i)]</p>	<p>Does the operator have procedures for prompt response to gas detected inside or near a building?</p>	<p>Satisfactory</p>
<p><u>General Comment:</u></p> <p><i>The procedure for prompt response to gas detected inside or near a building are located in the Emergency Plan Exhibit 7, Section 4 G, Pages 5-9.</i></p>		
<p>[192.615(a)(3)(ii)]</p>	<p>Does the operator have procedures for prompt response to a fire located near a pipeline?</p>	<p>Satisfactory</p>
<p><u>General Comment:</u></p> <p><i>The procedures for prompt response to fire located near a pipeline facility are located in the Emergency Operating Plan Exhibit 7, Section 4 G, Pages 5-9.</i></p>		
<p>[192.615(a)(3)(iii)]</p>	<p>Does the operator have procedures for prompt</p>	<p>Satisfactory</p>

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	response to an explosion near a pipeline?	
<u>General Comment:</u> <i>The procedures for prompt response to an explosion are located in the Emergency Operating Plan Exhibit 7, Section 4 G, Pages 5-9.</i>		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	Satisfactory
<u>General Comment:</u> <i>The procedures for prompt response to natural disasters are located in the Emergency Operating Plan Exhibit 7, Section 4 G, Pages 5-9.</i>		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	Satisfactory
<u>General Comment:</u> <i>The procedures for personnel, equipment, material and tools needed at the scene of an emergency are located in the Emergency Plan Exhibit 7, Section 6 Pages 1-11.</i>		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	Satisfactory
<u>General Comment:</u> <i>The procedures for protecting the public and then property are located in the Emergency Operating Plan Exhibit 7, Section 4 G, Page 5.</i>		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	Satisfactory
<u>General Comment:</u> <i>The procedures for pressure reduction are located in the Emergency Operating Plan Exhibit 7, Section 4 Pages 6-7.</i>		
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	Satisfactory
<u>General Comment:</u> <i>The procedures for making safe a potential hazard are located in the Emergency Operating Plan Exhibit 7, Section 4 F Page 4.</i>		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	Satisfactory
<u>General Comment:</u> <i>The procedures for requiring notification of public officials are located in the Emergency Operating Plan Exhibit 7, Attachment A Pages 1-5.</i>		
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	Satisfactory
<u>General Comment:</u>		

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<i>The procedure for investigating accidents and failures are located in the Emergency Plan Exhibit 7, Attachment B Pages 1-6.</i>		
[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	Satisfactory
<u>General Comment:</u> <i>The procedures for furnishing portions of the emergency plan are located in the Emergency Operating Plan Exhibit 7, Attachment A Pages 1-5.</i>		
[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	Satisfactory
<u>General Comment:</u> <i>The procedures for the emergency plan training are located in the Emergency Plan Exhibit 7, Section 9 Page 1.</i>		
[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	Satisfactory
<u>General Comment:</u> <i>The procedures for reviewing employee actions during an emergency are located in the Emergency Plan Exhibit 7, Section 9 Page 1.</i>		
[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	Satisfactory
<u>General Comment:</u> <i>The procedures for establishing liaison with public officials are located in the Emergency Plan Exhibit 7, Section 3 Pages 1-2.</i>		
Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?		Yes
<u>General Comment:</u> <i>The procedures in the Field Service Manual Exhibit 2, Section 11 Pages 12-14 address the migration of gas including additional locations and steps to ensure a hazardous condition does not exist.</i>		
FAILURE INVESTIGATION PROCEDURES		Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	Satisfactory
<u>General Comment:</u> <i>The procedures for analyzing accidents and failures are located in the Emergency Plan Exhibit 7, Section B Page 1.</i>		
MAOP PROCEDURES		Status

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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[192.605(a)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	Satisfactory
General Comment: <i>The procedures are located in Exhibit 1 General Order 3000 Pages 1-6.</i>		
[192.605(a)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure Low Pressure Distribution Systems?	Satisfactory
General Comment: <i>The procedures are located in Exhibit 1 General Order 3000 Pages 1-6.</i>		
[192.605(a)][192.619(a)(1)]	Is MAOP determined by design and test? or	Satisfactory
General Comment: <i>The MAOP is determined by test.</i>		
[192.605(a)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	Satisfactory
General Comment: <i>The procedure is located in Exhibit 13 page 240.</i>		
[192.605(a)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	Unsatisfactory
NOA Comment: <i>The O&M does not contain procedures or clearly define the method used to determine the MAOP for pipeline segments in existence prior to July 1, 1970. If the method outlined in 192.619(a) (3) was used to establish the MAOP of an existing pipeline segment procedures would need to be included outlining that process for determination.</i>		
[192.605(a)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	Unsatisfactory
NOA Comment: <i>The O&M does not contain procedures that clearly define the method used to determine the MAOP for existing pipeline segments. The procedures do not define a process for establishing the MAOP based on a safe pressure determined by the operator after considering the operating history and known corrosion.</i>		
[192.605(a)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	Satisfactory
General Comment: <i>The procedure is located in Exhibit 13 Pages 244-247.</i>		
PRESSURE TEST PROCEDURES		Status
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	Satisfactory

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<u>General Comment:</u>		
<i>The procedure for the use of pre-tested pipe is located in Distribution O&M Exhibit 1 General Order 3.001 Pages 1-2.</i>		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	Satisfactory
<u>General Comment:</u>		
<i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Page 1.</i>		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	Satisfactory
<u>General Comment:</u>		
<i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Page 1.</i>		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	Satisfactory
<u>General Comment:</u>		
<i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Page 1.</i>		
[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	Satisfactory
<u>General Comment:</u>		
<i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Page 2.</i>		
[192.13(c)][192.505(b)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for pressure test requirements for pipelines operating above 30% SMYS are located in Exhibit 13 Pages 235-243.</i>		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's	Satisfactory

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	procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	
<u>General Comment:</u> <i>The procedures for pressure test requirements for pipelines operating above 30% SMYS are located in Exhibit 13 Pages 235-243.</i>		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYSs or more for replacement components if not certified by manufacturer?	Satisfactory
<u>General Comment:</u> <i>The procedures for pressure test requirements for pipelines operating above 30% SMYS are located in Exhibit 13 Pages 235-243.</i>		
[192.13(c)][192.505(e)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	Satisfactory
<u>General Comment:</u> <i>The procedures for pressure test requirements for pipelines operating above 30% SMYS are located in Exhibit 13 Pages 235-243.</i>		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	Satisfactory
<u>General Comment:</u> <i>The procedures for pressure test requirements for pipelines operating less than 30% SMYS and above 100 psi are located in Exhibit 13 Page 240.</i>		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Pages 1-6.</i>		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	Satisfactory
<u>General Comment:</u>		

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<i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Pages 1-6.</i>		
[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Pages 1-6.</i>		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in the Distribution O&M Exhibit 1 General Order 3.000 Pages 1-6.</i>		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	Satisfactory
<u>General Comment:</u> <i>The procedures for testing, inspecting and record requirements are located in Exhibit 13, Section E Page 238.</i>		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	Satisfactory
<u>General Comment:</u> <i>The procedures for testing, inspecting and record requirements are located in Exhibit 13, Section E Page 238.</i>		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	Satisfactory
<u>General Comment:</u> <i>The procedures for testing, inspecting and record requirements are located in Exhibit 13, Section E Page 238.</i>		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	Satisfactory
<u>General Comment:</u> <i>The procedures for testing, inspecting and record requirements are located in Exhibit 13, Section E Page 238.</i>		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	Satisfactory
<u>General Comment:</u> <i>The procedures for testing, inspecting and record requirements are located in Exhibit 13, Section E Page 238.</i>		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that	Satisfactory

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	operate over 100 psig that include leaks and failures noted?	
<u>General Comment:</u> <i>The procedures for testing, inspecting and record requirements are located in Exhibit 13, Section E Page 238.</i>		
ODORIZATION of GAS PROCEDURES		Status
[192.605(a)][192.625(a)]	Does the operator's procedure include a requirement that distribution lines must contain odorized gas?	Satisfactory
<u>General Comment:</u> <i>The procedures for Odorization requirements are located in Exhibit 3 Gas Control Pages 1-11.</i>		
[192.605(a)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	Satisfactory
<u>General Comment:</u> <i>The procedure located in Exhibit 13 Page 103 requires odorized gas in Class 3 and 4 locations.</i>		
[192.605(a)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	Satisfactory
<u>General Comment:</u> <i>The procedures for Odorization requirements are located in Exhibit 3 Gas Control Pages 1-11.</i>		
TAPPING PIPELINES UNDER PRESSURE PROCEDURES		Status
[192.605(a)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	Satisfactory
<u>General Comment:</u> <i>The procedures that require qualified persons to make hot taps are located in Exhibit 6 Page 36.</i>		
PIPELINE PURGING PROCEDURES		Status
[192.605(a)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	Satisfactory
<u>General Comment:</u> <i>The purging procedures are located in Exhibit 12 Chapter 8.</i>		
[192.605(a)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Satisfactory
<u>General Comment:</u> <i>The purging procedures are located in Exhibit 12 Chapter 8.</i>		

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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MAINTENANCE PROCEDURES		Status
[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Satisfactory
General Comment: The procedure for replacing or repairing a segment that becomes unsafe is located in Exhibit 0, General Page 16.		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
General Comment: The procedure for repairing hazardous leaks is located in Exhibit 12, Chapter 10 Page 7.		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	Satisfactory
General Comment: The procedures for the requirements for transmission patrolling and leakage surveys are located in Exhibit 4 Pages 1-19.		
[192.605(b)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	Satisfactory
General Comment: The procedures for the requirements for transmission patrolling and leakage surveys are located in Exhibit 4 Pages 1-19.		
[192.605(b)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	Satisfactory
General Comment: The procedures for the requirements for transmission patrolling and leakage surveys are located in Exhibit 4 Pages 1-19.		
[192.605(b)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	Not Applicable
General Comment: The procedures located in the O&M General Exhibit 0 Page 24 indicate all gas transported by Peoples Gas in Class 3 and 4 locations is odorized.		
[192.605(b)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months	Not Applicable

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	but at least 4 times each calendar year?	
<p><u>General Comment:</u></p> <p>The procedures located in the O&M General Exhibit 0 Page 24 indicate all gas transported by Peoples Gas in Class 3 and 4 locations is odorized.</p>		
DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	Satisfactory
<p><u>General Comment:</u></p> <p>The procedures for conducting Distribution Patrolling of mains are located in the O&M Exhibit 4 Safety Inspection Program Page 18.</p>		
[192.605(b)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	Satisfactory
<p><u>General Comment:</u></p> <p>The procedures for conducting Distribution Patrolling of mains are located in the O&M Exhibit 4 Safety Inspection Program Page 18.</p>		
[192.605(b)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	Satisfactory
<p><u>General Comment:</u></p> <p>The procedures for conducting Distribution Patrolling of mains are located in the O&M Exhibit 4 Safety Inspection Program Page 18.</p>		
[192.605(b)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	Satisfactory
<p><u>General Comment:</u></p> <p>The procedures for conducting Distribution Leakage Surveys are located in the O&M Exhibit 4 Safety Inspection Program Page 14.</p>		
[192.605(b)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	Satisfactory

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<u>General Comment:</u>		
The procedures for conducting Distribution Leakage Surveys are located in the O&M Exhibit 4 Safety Inspection Program Page 14.		
LINE MARKER PROCEDURES		Status
[192.605(b)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	Satisfactory
<u>General Comment:</u>		
The procedure for line markers is located in Exhibit 1, General Order 0.821 Pages 1-3.		
TRANSMISSION RECORD KEEPING PROCEDURES		Status
[192.605(b)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	Satisfactory
<u>General Comment:</u>		
Exhibit 13, Page 247 indicate all records will be maintained for the life of the pipeline.		
[192.605(b)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	Satisfactory
<u>General Comment:</u>		
Exhibit 13, Page 247 indicate all records will be maintained for the life of the pipeline.		
[192.605(b)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	Satisfactory
<u>General Comment:</u>		
Exhibit 13, Page 247 indicate all records will be maintained for the life of the pipeline.		
TRANSMISSION FIELD REPAIR PROCEDURES		Status
[192.605(b)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
<u>General Comment:</u>		
The procedures are located in the O&M Exhibit 13 Page 177.		
[192.605(b)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during	Satisfactory

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	repair operations?	
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Page 101.</i>		
[192.605(b)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Page 177.</i>		
[192.605(b)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Page 196.</i>		
[192.605(b)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Pages 176-185.</i>		
[192.605(b)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Pages 176-185.</i>		
[192.605(b)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of	Satisfactory

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	appropriate design must be installed?	
<u>General Comment:</u> The procedures are located in the O&M Exhibit 13 Pages 176-185.		
[192.605(b)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	Satisfactory
<u>General Comment:</u> The procedures are located in the O&M Exhibit 13 Page 177.		
[192.605(b)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	Satisfactory
<u>General Comment:</u> The procedures are located in the O&M Exhibit 13 Page 184.		
[192.605(b)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	Satisfactory
<u>General Comment:</u> The procedures are located in the O&M Exhibit 13 Page 184.		
[192.605(b)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	Satisfactory
<u>General Comment:</u> The procedures are located in the O&M Exhibit 13 Page 184.		
[192.605(b)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically	Satisfactory

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	apply a full encirclement split sleeve of appropriate design? OR	
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Page 184.</i>		
[192.605(b)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Page 177.</i>		
[192.605(b)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Page 184.</i>		
[192.605(b)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O&M Exhibit 13 Page 184.</i>		
TEST REQUIREMENTS FOR REINSTATING SERVICE LINES		Status
[192.605(b)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in Exhibit 1 General Order 3.001 Pages 1-2.</i>		
[192.605(b)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in Exhibit 1 General Order 3.001 Pages 1-2.</i>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status

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[192.605(b)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	Satisfactory
<u>General Comment:</u> <i>The procedures for disconnecting and sealing requirements are located in Exhibit 1 General Order 3.100 Pages 1-5.</i>		
[192.605(b)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	Satisfactory
<u>General Comment:</u> <i>The procedures for disconnecting and sealing requirements are located in Exhibit 1 General Order 3.100 Pages 1-5.</i>		
[192.605(b)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	Satisfactory
<u>General Comment:</u> <i>The procedure for providing a locking device is located in the O-M Plan Field Service Manual Exhibit 2 Section 3 Page 9.</i>		
[192.605(b)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	Satisfactory
<u>General Comment:</u> <i>The procedure for providing mechanical means and preventing gas flow is located in the O-M Plan Field Service Manual Exhibit 2 Section 5 Page 2.</i>		
[192.605(b)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	Satisfactory
<u>General Comment:</u> <i>The procedure for physically disconnecting the gas supply is located in the O-M Plan Field Service Manual Exhibit 2 Section 5 Page 2.</i>		
[192.605(b)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	Satisfactory
<u>General Comment:</u> <i>The procedure for ensuring a combustible mixture is not present during purging operations is located in the O-M Plan Exhibit 1 General Order 3.100 Pages 1-5.</i>		

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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[192.605(b)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	Satisfactory
General Comment: <i>The procedure for the abandonment of mains crossing over or under a navigable water way is located in O-M Plan Exhibit 13 Page 231 Reporting.</i>		
COMPRESSOR STATION PROCEDURES		Status
Category Comment: <i>Staff did not inspect the compressor station section of the O&M during this audit, an additional audit will be conducted of the storage field and operations at a later date.</i>		
[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	Not Checked
[192.605(b)(7)][192.605(b)(7)]	Does the operator's procedure require starting, operating, and shutdown procedures for gas compressor units?	Not Checked
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	Not Checked
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	Not Checked
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	Not Checked
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	Not Checked
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	Not Checked
PRESSURE LIMITING and REGULATING STATION PROCEDURES		Status
[192.605(b)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Satisfactory

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

Unless otherwise noted, all code references are to 49CFR Part 192.

If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<u>General Comment:</u> <i>The procedure requiring the inspection and testing of pressure regulating and limiting equipment are located in the O-M Plan Exhibit 4 Safety Inspections Program Page 19.</i>		
[192.605(b)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	Satisfactory
<u>General Comment:</u> <i>The procedure requiring the inspection and testing of pressure regulating and limiting equipment are located in the O-M Plan Exhibit 4 Safety Inspections Program Page 19.</i>		
[192.605(b)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Satisfactory
<u>General Comment:</u> <i>The procedure requiring the inspection and testing of pressure regulating and limiting equipment are located in the O-M Plan Exhibit 4 Safety Inspections Program Page 19.</i>		
[192.605(b)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Satisfactory
<u>General Comment:</u> <i>The procedure requiring the inspection and testing of pressure regulating and limiting equipment are located in the O-M Plan Exhibit 4 Safety Inspections Program Page 19.</i>		
[192.605(b)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	Satisfactory
<u>General Comment:</u> <i>The procedure requiring the inspection and testing of pressure regulating and limiting equipment are located in the O-M Plan Exhibit 4 Safety Inspections Program Page 11.</i>		
[192.605(b)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	Satisfactory
<u>General Comment:</u> <i>The procedures for telemetering and recording gauges are located in the O-M Plan Exhibit 12 Gas Operations Manual Chapter 4 Section 1 Pages 1-10.</i>		

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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[192.605(b)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	Satisfactory
<u>General Comment:</u> The procedures for telemetering and recording gauges are located in the O-M Plan Exhibit 12 Gas Operations Manual Chapter 4 Section 1 Pages 1-10.		
[192.605(b)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	Satisfactory
<u>General Comment:</u> The procedures for the inspection of high or low pressure are located in Exhibit 7 Section 4 Page 4.		
[192.605(b)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	Satisfactory
<u>General Comment:</u> The procedures are located in Exhibit 4 Safety Inspection Program E Page 11.		
[192.605(b)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	Not Applicable
<u>General Comment:</u> People's gas utilizes a monitor configuration for overpressure protection as well as security valves.		
[192.605(b)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	Not Applicable
<u>General Comment:</u> People's gas utilizes a monitor configuration for overpressure protection as well as security valves.		
VALVE AND VAULT MAINTENANCE PROCEDURES		Status
[192.605(b)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> The procedure for valve inspections is located in the Gas Operations Manual Chapter 5, Section 2 Page 9.		
[192.605(b)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	Satisfactory

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<u>General Comment:</u>		
The procedure for valve inspections is located in Exhibit 1 General order 0600. Pages 1-10.		
[192.605(b)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
The procedure for valve inspections is located in Exhibit 1 General order 0600. Pages 1-10.		
[192.605(b)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	Satisfactory
<u>General Comment:</u>		
The procedure for valve inspections is located in Exhibit 1 General order 0600. Pages 1-10.		
[192.605(b)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
The procedure for vault inspections is located in the O-M Plan Exhibit 4 Safety Inspection Program Page 19.		
PREVENTION of ACCIDENTAL IGNITION PROCEDURES		Status
[192.605(b)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	Satisfactory
<u>General Comment:</u>		
The procedure for accidental ignition is located in the O-M Plan Exhibit 1 General Order 1.100 Pages 1-3.		
[192.605(b)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	Satisfactory
<u>General Comment:</u>		
The procedure for accidental ignition is located in the O-M Plan Exhibit 1 General Order 1.100 Pages 1-3.		
[192.605(b)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	Satisfactory
<u>General Comment:</u>		
The procedure for accidental ignition is located in the O-M Plan Exhibit 1 General Order 1.100 Pages 1-3.		
CAULKED BELL AND SPIGOT JOINTS PROCEDURES		Status

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[192.605(b)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	Satisfactory
<u>General Comment:</u> <i>The procedures for cast iron joints are located in the O-M Main Work Orders 1.002-1.007.</i>		
[192.605(b)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	Satisfactory
<u>General Comment:</u> <i>The procedures for cast iron joints are located in the O-M Main Work Orders 1.002-1.007.</i>		
PROTECTING CAST-IRON PIPELINE PROCEDURES		Status
[192.605(b)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or blasting?	Satisfactory
<u>General Comment:</u> <i>The procedure for prevention of buried gas facilities is located in the O&M Exhibit 1 General Order .800 Pages 1-38.</i>		
[192.605(b)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	Satisfactory
<u>General Comment:</u> <i>The procedure for prevention of buried gas facilities is located in the O&M Exhibit 1 General Order .800 Pages 1-38.</i>		
[192.605(b)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	Satisfactory
<u>General Comment:</u> <i>The procedure for prevention of buried gas facilities is located in the O&M Exhibit 1 General Order .800 Pages 1-38.</i>		
[192.605(b)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future	Satisfactory

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	excavations near the pipeline?	
<u>General Comment:</u> <i>The procedure for prevention of buried gas facilities is located in the O&M Exhibit 1 General Order .800 Pages 1-38.</i>		
[192.605(b)][192.755(a)(5)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	Satisfactory
<u>General Comment:</u> <i>The procedure for prevention of buried gas facilities is located in the O&M Exhibit 1 General Order .800 Pages 1-38.</i>		
[192.605(b)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	Satisfactory
<u>General Comment:</u> <i>The procedure for prevention of buried gas facilities is located in the O&M Exhibit 1 General Order .800 Pages 1-38.</i>		
WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES		Status
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Exhibit 1 Page 2.</i>		
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4 Page 2.</i>		
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Appendix Pages 1-18.</i>		
[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	Not Applicable
<u>General Comment:</u> <i>Peoples Gas does not qualify welders under Appendix C.</i>		

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[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	Satisfactory
<u>General Comment:</u> The procedures are located in the O-M Exhibit 8 Welding Section 4 206.1.1.1 Pages 14-15.		
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	Satisfactory
<u>General Comment:</u> The procedures are located in the O-M Exhibit 8 Welding Appendix Pages 1-18.		
[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at > 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104?	Satisfactory
<u>General Comment:</u> The procedures are located in the O-M Exhibit 8 Welding Appendix Pages 1-18.		
[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	Satisfactory
<u>General Comment:</u> The procedures are located in the O-M Exhibit 8 Welding Appendix Pages 1-18.		
[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	Not Applicable
<u>General Comment:</u> Peoples Gas does not qualify welders under Appendix C.		
[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	Not Applicable
<u>General Comment:</u> Peoples Gas does not qualify welders under Appendix C.		
[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	Satisfactory

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<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4 210.5 Page 17.</i>		
[192.13(c)][192.233]	Does the operator's procedure require that miter joints be made in accordance with this section?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 13, Section F Page 191.</i>		
[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4 210.2 Page 16.</i>		
[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4 211.3 Page 19.</i>		
[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4 205.2.3 Page 9.</i>		
[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 13, Section H Page 194.</i>		
[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	Satisfactory
<u>General Comment:</u>		

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<i>The procedures are located in the O-M Exhibit 13 Transmission Section H Page 194. The procedure states 100% radiography shall be employed despite the exception.</i>		
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on nondestructively tested or visually inspected, is determined according to the standards in Section 9 of API Standard 1104?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4 206.1.2 Page 15.</i>		
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4, 212 Page 19.</i>		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4, 212.2 Page 20.</i>		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 4, 212.7 Page 20.</i>		
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		No
<u>General Comment:</u> <i>Staff did not discuss the low hydrogen process with the operator.</i>		
TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES		Status
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 13 Pages 1-11.</i>		
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	Satisfactory

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<u>General Comment:</u>		
<i>The procedures are located in the O-M Exhibit 8 Welding Section 13 Pages 1-11.</i>		
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	Satisfactory
<u>General Comment:</u>		
<i>The procedures are located in the O-M Exhibit 8 Welding Section 13 Pages 1-11.</i>		
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	Satisfactory
<u>General Comment:</u>		
<i>The procedures are located in the O-M Exhibit 8 Welding Section 13 Pages 1-11.</i>		
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	Satisfactory
<u>General Comment:</u>		
<i>The procedures are located in the O-M Exhibit 8 Welding Section 6 Page 8.</i>		
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	Satisfactory
<u>General Comment:</u>		
<i>The procedures are located in the O-M Exhibit 8 Welding Section 6 Page 8.</i>		
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road	Satisfactory

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	crossings, 100% unless impracticable, then 90%?	
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 6 Page 8.</i>		
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 6 Page 8.</i>		
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 8 Welding Section 6 Page 8.</i>		
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Exhibit 13 Page 194.</i>		
JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES		Status
[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Plan Exhibit 1 General Order 0.650 Pages 1-4 and Main Work Order 9.090 Pages 1-2.</i>		
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M 520: Section 520.4.2 Page 6 and Service Pipe Work Order 1.000 Page 1.</i>		
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	Satisfactory
<u>General Comment:</u>		

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<i>The procedures are located in the O-M Distribution Main Orders 9.040-9.100.</i>		
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Distribution Main Order 9.100 Page 1.</i>		
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Distribution Main Order 9.100 Page 1.</i>		
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Distribution Main Order 9.100 Page 1.</i>		
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Distribution Main Order 9.100 Pages 2-3.</i>		
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified if during any 12 month period that person does not make any joints or has 3 joints or 3% of joints, whichever is greater, found to be unacceptable?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Distribution Main Order 9.100 Page 5.</i>		
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	Satisfactory
<u>General Comment:</u> <i>The procedures are located in the O-M Distribution Main Order 9.100 Pages 2-3.</i>		
[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	Satisfactory
<u>General Comment:</u>		

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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The procedures are located in the O-M Distribution Main Order 9.100 Page 5.

CORROSION CONTROL PROCEDURES		Status
[192.605(b)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	Satisfactory
General Comment: The procedures for the design and maintenance of the corrosion protection system are located in Exhibit 10, Section 2 Page 4.		
[192.605(b)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	Satisfactory
General Comment: The procedures are located in Exhibit 10 Section 3 Page 5.		
[192.605(b)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	Not Applicable
General Comment: Peoples gas does not install aluminum or copper pipe as stated in Exhibit 10 Section 5 Page 11.		
[192.605(b)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	Satisfactory
General Comment: The procedures are located in Exhibit 10 Section 5 Page 10.		
[192.605(b)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	Satisfactory
General Comment: The procedures are located in Exhibit 10 Section 5 Page 11.		

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[192.605(b)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	Satisfactory
<u>General Comment:</u> The procedure requiring suitable coatings to prevent atmospheric corrosion is located in Exhibit 10 Section 7 Page 22.		
[192.605(b)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	Satisfactory
<u>General Comment:</u> The procedures are located in Exhibit 10 Page 20.		
[192.605(b)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	Satisfactory
<u>General Comment:</u> The procedures are located in Exhibit 10 Page 6.		
[192.605(b)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	Satisfactory
<u>General Comment:</u> The procedure is located in Exhibit 10 Section E Page 16.		
[192.605(b)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	Satisfactory
<u>General Comment:</u> The procedure is located in Exhibit 10 Section E Page 17.		
[192.605(b)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	Satisfactory
<u>General Comment:</u> The procedure is located in Exhibit 10 Section E Page 18.		
[192.605(b)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	Satisfactory

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<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Section E Page 18.</i>		
[192.605(b)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Section E Page 19.</i>		
[192.605(b)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Section 5 Page 11.</i>		
[192.605(b)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Page 13.</i>		
[192.605(b)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Page 13.</i>		
[192.605(b)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Page 13.</i>		
[192.605(b)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Page 14.</i>		
[192.605(b)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical	Satisfactory

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	measurement are established to determine the adequacy of cathodic protection?	
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 12.</i>		
[192.605(b)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 10.</i>		
[192.605(b)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 20.</i>		
[192.605(b)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 20.</i>		
[192.605(b)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	Not Applicable
<u>General Comment:</u> <i>Peoples Gas does not transport corrosive gas at this location, a separate review of the procedures for outside the city of Chicago will be conducted at a later date. The requirements will be in effect for the storage field O&M.</i>		
[192.605(b)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 21-22.</i>		
[192.605(b)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	Satisfactory
<u>General Comment:</u>		

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<i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 21-22.</i>		
[192.605(b)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192.489?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 21-22.</i>		
[192.605(b)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 21-22.</i>		
[192.605(b)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	Not Applicable
<u>General Comment:</u> <i>Peoples Gas does not transport corrosive gas at this location, a separate review of the procedures for outside the city of Chicago will be conducted at a later date. The requirements will be in effect for the storage field O&M.</i>		
[192.605(b)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	Not Applicable
<u>General Comment:</u> <i>Peoples Gas does not transport corrosive gas at this location, a separate review of the procedures for outside the city of Chicago will be conducted at a later date. The requirements will be in effect for the storage field O&M.</i>		
[192.605(b)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 21.</i>		
[192.605(b)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 22-23.</i>		
[192.605(b)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over	Satisfactory

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	water?	
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 22.</i>		
[192.605(b)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 23-25.</i>		
[192.605(b)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 23-25.</i>		
[192.605(b)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 23-25.</i>		
[192.605(b)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Pages 23-25.</i>		
[192.605(b)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 13 Page 101.</i>		
[192.605(b)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 24.</i>		
[192.605(b)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u>		

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<i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 24.</i>		
[192.605(b)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 24.</i>		
[192.605(b)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	Satisfactory
<u>General Comment:</u> <i>The procedure is located in Exhibit 10 Corrosion Control Policy Page 24.</i>		
[192.605(b)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	Satisfactory
<u>General Comment:</u> <i>The procedure for maintaining the record requirements are located in Exhibit 10 Corrosion Control Policy Page 25.</i>		
[192.605(b)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	Satisfactory
<u>General Comment:</u> <i>The procedure for maintaining the record requirements are located in Exhibit 10 Corrosion Control Policy Page 25.</i>		
[192.605(b)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	Satisfactory
<u>General Comment:</u> <i>The procedure for maintaining the record requirements are located in Exhibit 10 Corrosion Control Policy Page 25.</i>		
UPRATING PROCEDURES		Status
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	Satisfactory
<u>General Comment:</u> <i>The procedures for uprating are located in Exhibit 1 Main Work Order 7.100 Pages 1-4.</i>		
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	Satisfactory
<u>General Comment:</u>		

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<i>The procedures for uprating are located in Exhibit 1 Main Work Order 7.100 Pages 1-4.</i>		
[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for uprating are located in Exhibit 1 Main Work Order 7.100 Pages 1-4.</i>		
[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	Satisfactory
<u>General Comment:</u>		
<i>The procedures for uprating are located in Exhibit 1 Main Work Order 7.100 Pages 1-4.</i>		
TRAINING		Status
<u>Category Comment:</u>		
<i>The training program is included in the O-M Exhibit 6 Pages 1-79.</i>		
[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	Satisfactory
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	Satisfactory
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	Satisfactory
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	Satisfactory
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	Satisfactory
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or	Not Applicable

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	programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	
<u>General Comment:</u> <i>Peoples Gas is not a municipal operator.</i>		
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	Satisfactory

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